

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RYAN PERRY, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

CABLE NEWS NETWORK, INC., a
Delaware corporation, and CNN
INTERACTIVE GROUP, INC., a Delaware
corporation,

Defendants.

Case No. 1:14-cv-1194

Assigned Judge:
Robert W. Gettleman

Designated Magistrate Judge:
Sheila M. Finnegan

**AGREED MOTION FOR EXTENSION OF TIME FOR DEFENDANTS
TO ANSWER, MOVE, OR OTHERWISE RESPOND TO THE COMPLAINT**

Pursuant to the parties' agreement, Defendants Cable News Network, Inc. and CNN Interactive Group, Inc. ("Defendants"), without waiving any defenses, including, without limitation, lack of personal jurisdiction, that may be raised by Defendants in their answer or pre-answer motion, respectfully move for an extension of time to April 25, 2014 in which to answer, move, or otherwise respond to the Complaint. In further support of this agreed motion, Defendants state as follows:

1. Plaintiff Ryan Perry ("Plaintiff") filed the Class Action Complaint and Demand for Jury Trial (the "Complaint") in this action on February 18, 2014.
2. Defendants were served with the Complaint and summons on February 21, 2014. Pursuant to Federal Rule of Civil Procedure 12, Defendants' deadline to answer, move, or otherwise respond is currently March 14, 2014.
3. In order to conduct a complete review of the Complaint and prepare an

appropriate response, Defendants request an extension of time to answer, move, or otherwise respond to the Complaint through and including April 25, 2014.

4. Defendants contacted counsel for Plaintiff and Plaintiff has consented to Defendants' request for an extension of time.

5. This requested extension is not being made for any purpose of delay and no party will be prejudiced by this request. Further, Defendants have not previously requested nor been granted an extension of time.

WHEREFORE, for the foregoing reasons, Defendants respectfully request that the Court extend their time to answer, move, or otherwise respond to the Complaint up to and including April 25, 2014.

Respectfully submitted, this 7th day of March, 2014.

/s/ Danielle N. Twait
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that on March 7, 2014, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record:

Jay Edelson
Rafey S. Balabanian
Benjamin H. Richman
J. Dominick Larry
Courtney C. Booth
EDELSON PC
350 North LaSalle Street, Suite 1300
Chicago, IL 60654

This 7th day of March, 2014.

/s/ Danielle N. Twait
Attorney for Defendants